

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

DONNA CURLING, et al.,

Plaintiffs,

CIVIL ACTION FILE

v.

NO. 1:17-CV-02989-AT

BRIAN KEMP, et al.,

Defendants.

MOTION TO STAY

COME NOW the State Election Board members and Secretary of State (the “State Defendants”) and move to stay the Court’s Order in this case pending appellate review including, but not limited to, all pre-trial and trial proceedings, pending State Defendants’ interlocutory appeal to the United States Circuit Court of Appeals for the Eleventh Circuit. A brief in support of this motion is filed herewith and a proposed order is attached hereto.

{Signatures on the Following Page}

-Respectfully submitted, this 23rd day of September, 2018.

BARNES LAW GROUP, LLC

/s/John F. Salter

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*Attorneys for Defendants Brian P. Kemp, David J. Worley, Rebecca N. Sullivan,
Ralph F. "Rusty" Simpson, Seth Harp, & The State Election Board*

CERTIFICATE OF COMPLIANCE

I hereby certify that I have read the Court's Standing Order in Cases Proceedings Before the Honorable Amy Totenberg and that I will comply with its provisions during the pendency of this litigation.

/s/John F. Salter

CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 5.1

The undersigned hereby certifies that the foregoing document has been prepared in accordance with the font type and margin requirements of Local Rule 5.1 of the Northern District of Georgia, using a font type of Times New Roman and a point size of 14.

/s/John F. Salter

CERTIFICATE OF SERVICE

I hereby certify that on this date I have electronically filed the foregoing **MOTION TO STAY** with the Clerk of Court using the CM/ECF system, which will send email notification of such filing to all attorneys of record.

This 23rd day of September, 2018.

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/s/John F. Salter

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